

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IOENGINE, LLC,
Plaintiff,

v.

PAYPAL HOLDINGS, INC.,
Defendant.

C.A. No. 18-452-WCB

JURY TRIAL DEMANDED

INGENICO INC.,

Plaintiff,

v.

IOENGINE, LLC,

Defendant.

C.A. No. 18-826-WCB

IOENGINE, LLC,

Counterclaim Plaintiff,

v.

INGENICO INC., INGENICO CORP., and
INGENICO GROUP SA,

Counterclaim Defendants.

**IOENGINE’S MOTION REQUESTING ISSUANCE OF
LETTERS OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE
PURSUANT TO THE HAGUE EVIDENCE CONVENTION**

IOENGINE, LLC, by and through its undersigned attorneys, respectfully request that the Court issue a letter of request for international judicial assistance in each of the above captioned cases, attached hereto, pursuant to Article I of the Hague Convention of 18 March 1970 on the

Taking of Evidence Abroad in Civil or Commercial Matters, and Rules 26 and 28 of the Federal Rule of Civil Procedure.

The grounds for this request are set forth in IOENGINE's brief, filed herewith.

Dated: July 12, 2021

SMITH, KATZENSTEIN & JENKINS LLP

OF COUNSEL:

Noah M. Leibowitz
Gregory T. Chuebon
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3500
noah.leibowitz@dechert.com
greg.chuebon@dechert.com

Derek J. Brader
DECHERT LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
(215) 994-4000
derek.brader@dechert.com

Michael J. Joshi
DECHERT LLP
3000 El Camino Real
Five Palo Alto Square, Suite 650
Palo Alto, CA 94306
(650) 813-4800
michael.joshi@dechert.com

/s/ Eve H. Ormerod

Neal C. Belgam (No. 2721)
Eve H. Ormerod (No. 5369)
1000 West Street, Suite 1501
Wilmington, DE 19801
(302) 652-8400
nbelgam@skjlaw.com
eormerod@skjlaw.com

Attorneys for IOENGINE, LLC